

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA**

Raymond Doricchi, Plaintiff, v. Greenville County Sheriff's Department, et al. Defendants.	C. A. NO. 6:17 -cv-01636-TMC DEFENDANT JEREMY JONES' 26(a)(3) PRE-TRIAL DISCLOSURES
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Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, Defendant Jones' Pretrial Disclosures are as follows:

- (i) the name and, if not previously provided, the address and telephone number of each witness separately identifying those the party expects to present and those it may call if the need arises;

ANSWER:

A. Defendant expects to call:

1. **Jeremy Jones**
2. **Sgt. H. Weinmueller**
3. **Lt. Scot Brewer**
4. **Lt. M. A. East**
5. **Deputy Avigliano - served warrant(s)/obtained statement(s)**
6. **Justin Lanford - responded to GMH and transported plaintiff to Detention Center.**
7. **Judge Thompson issued warrants.**
8. **Judge O'Brien issued warrant for Polk County Fugitive**
9. **Kera Bennick - Property & Evidence**
10. **Jennifer Joley - Property & Evidence**
11. **James W. Armstrong - See Drug Analysis Test**
12. **Miles Dean Bryant - See statement**
13. **Larry Burger**
14. **Medical personnel who rendered care and/or treatment to the plaintiff**
 - a. **L. Chase Allen, MD**
 - b. **B. F. Tripp Masters, III, MD**

B. Defendant may call:

1. **Capt. James Beaver**
2. **Judge Stilwell**

- 3. Judge Cagle**
- 4. Judge Ayers**
- 5. Judge Metz Looper**
- 6. Ryan Holloway, Solicitor's Office**
- 7. Jennifer Joley - Property & Evidence**
- 8. Michael Robert Koerner, MD**
- 9. Jacqueline Wiles**
- 10. Kate Wessinger**
- 11. Lauren Lapierre, RN**
- 12. Patricia Love, RC**
- 13. Teresa Oldson, MD**
- 14. Any witness identified in Plaintiff's Rule 26(a)(3) Pre-Trial Disclosures**

(ii) the designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition; and

ANSWER: Defendant does not intend to present testimony by deposition but reserves the right to present depositions for the purposes of impeachment.

(iii) an identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises.

ANSWER: A. Defendant expects to offer:

- 1. Memo of Capt. M. A. East to Sheriff Steve Loftis dated 5/12/15;**
- 2. Response to Resistance/Aggression dated 5/9/15**
- 3. Incident Report/Supplemental of Jeremy Jones dated 5/9/15**
- 4. Supplemental Report of Justin Lanford dated 5/10/15**
- 5. Witness Statement of Miles Dean Bryant dated 5/9/15**
- 6. Property & Evidence forms**
- 7. Public Safety Laboratory Analysis Request & Drug Analysis forms**
- 8. Arrest Warrant 2015A2330203896, Resisting/Resisting Arrest**
- 9. Arrest Warrant 2015A2330203897, Drugs/Possession of less than one gram of meth or cocaine base**

- 10. Arrest Warrant 2015A2330203894, Disorderly/Public Disorderly Conduct**
- 11. Arrest Warrant 2015A2330203899, Report/Giving False Information to law enforcement**
- 12. Arrest Warrant 2015A2330203898, Ordinance/Possession of Drug Paraphernalia**
- 13. Indictment Records**
- 13. Chain of Custody Report(s)**
- 14. CAD reports, 911 calls and/or Radio Traffic**
- 15. Raymond Doricchi SLED report (Bates No. WJCB – SLED 0001-0021)**
- 16. Arrest Warrant I-545108 Traffic/Failure to stop for blue light (Bates No. GC Solicitor's Office/Doricchi – 0079)**
- 17. Arrest Warrant I-577696 Traffic/Failure to stop for a blue light (Bates No. GC Solicitor's Office/Doricchi – 0102)**

B. Defendant may offer:

- 1. Training file of Jeremy Jones**
- 2. Medical records of the plaintiff.**
- 3. General Order 205, Response to Resistance/Aggression**
- 4. SC Code of Ordinances, Article III: Drug Paraphernalia**
- 5. Defendant may utilize any pleadings or discovery filed and/or served by any of the parties as direct evidence and/or for impeachment purposes.**

Further, the following Deposition Transcripts may be utilized for impeachment purposes:

<u>Deponent</u>	<u>Date of Depo</u>
Raymond Doricchi	<i>October 16, 2018</i>
Miles Bryant	<i>October 16, 2018</i>

Respectfully submitted,

s/ Charles F. Turner, Jr.

Charles F. Turner, Jr. (Fed ID # 05849)
872 S. Pleasantburg Drive
Greenville, SC 29607
Telephone: (864) 672-3711
Facsimile: (864) 373-7055
Email: cfturner@wjlaw.net
Attorneys for Defendant Jeremy Jones

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Greenville, South Carolina